

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Afiniti, Ltd.,<sup>1</sup>

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 24-12539 (LSS)

**NOTICE OF AMENDED<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON NOVEMBER 27, 2024 AT 10:00 A.M. (ET)**

**This hearing will be conducted in-person, any exceptions must be approved by chambers. Parties may observe the hearing remotely by registering at the link below no later than 4:00 p.m. (ET) the business day prior to the hearing.**

**To attend a hearing remotely, please register using the eCourtAppearance tool ([available here](#)) or on the Court's website at [www.deb.uscourts.gov](http://www.deb.uscourts.gov).**

**After the deadline has passed an electronic invitation, with the relevant audio or video link, will be emailed to you prior to the hearing.**

**MATTER GOING FORWARD**

1. Verified Petition and Motion Under Chapter 15 for (I) Recognition of a Foreign Main Proceeding, (II) Recognition of JPL Appointment Order, (III) Recognition of Sanction Order, (IV) Approval of Free and Clear Transfer of Assets, (V) Approval of the Procedure Governing the Closing of this Chapter 15 Case, and (VI) Related Relief [[D.I. 4](#); 11/4/24]

Related Pleadings:

- a) Voluntary Petition of Afiniti, Ltd. – Case No. 24-12539 [[D.I. 1](#); 11/3/24]
- b) Declaration of Hassan Afzal in Support of the Verified Petition and Motion Under Chapter 15 for (I) Recognition of a Foreign Main Proceeding, (II) Recognition of JPL Appointment Order, (III) Recognition of Sanction Order, (IV) Approval of Free and Clear Transfer of Assets, (V) Approval of

---

<sup>1</sup> The Debtor's registration number is 45859. The location of the Debtor's registered office is Crawford House, 50 Cedar Avenue, Hamilton, Pembroke, HM 11, Bermuda.

<sup>2</sup> Amended items are bolded.

the Procedure Governing the Closing of this Chapter 15 Case, and (VI) Related Relief [[D.I. 5](#); 11/4/24]

- c) Declaration of C. Christian R. Luthi in Support of Verified Petition and Motion Under Chapter 15 for (I) Recognition of a Foreign Main Proceeding, (II) Recognition of JPL Appointment Order, (III) Recognition of Sanction Order, (IV) Approval of Free and Clear Transfer of Assets, (V) Approval of the Procedure Governing the Closing of this Chapter 15 Case, and (VI) Related Relief [[D.I. 6](#); 11/4/24]
- d) Notice of Filing and Hearing on (A) Chapter 15 Petition for Recognition, (B) Recognition of JPL Appointment Order, (C) Recognition of Sanction Order, (D) Approval of Free and Clear Transfer of Assets, (E) Approval of the Procedure Governing the Closing of This Chapter 15 Case, and (F) Granting Related Relief [[D.I. 8](#); 11/4/24]
- e) Order (I) Scheduling a Hearing on (A) Chapter 15 Petition for Recognition, (B) Recognition of JPL Appointment Order, (C) Recognition of Sanction Order, (D) Approval of Free and Clear Transfer of Assets, (E) Approval of the Procedure Governing the Closing of This Chapter 15 Case, and (F) Granting Related Relief; and (II) Specifying Form and Manner of Notice Thereof [[D.I. 30](#); 11/13/24]
- f) *Updated* Notice of Filing and Hearing on (A) Chapter 15 Petition for Recognition, (B) Recognition of JPL Appointment Order, (C) Recognition of Sanction Order, (D) Approval of Free and Clear Transfer of Assets, (E) Approval of the Procedure Governing the Closing of This Chapter 15 Case, and (F) Granting Related Relief [[D.I. 31](#); 11/13/24]
- g) Notice of Filing of Ruling on Sanction Application in Foreign Proceeding [[D.I. 32](#); 11/20/24]
- h) Notice of Filing of Approved Sanction Order After Judgment [[D.I. 33](#); 11/22/24]
- i) *Updated* Notice of Ruling on Sanction Application in Foreign Proceeding [(SEALED) D.I. 34; 11/25/24]
- j) **Foreign Representative's Supplemental Brief Regarding Status and in Support of Recognition Motion** [[D.I. 37](#); 11/26/24]
- k) **Declaration of Steven Smith in Support of Verified Petition and Motion Under Chapter 15 for (I) Recognition of a Foreign Main Proceeding, (II) Recognition of JPL Appointment Order, (III) Recognition of Sanction Order, (IV) Approval of Free and Clear Transfer of Assets, (V) Approval of the Procedure Governing the Closing of this Chapter 15 Case, and (VI) Related Relief** [[D.I. 38](#); 11/26/24]

**l) Notice of Bermuda Court's Denial of Injunction [\[D.I. 39, 11/26/24\]](#)**

- m) Declaration of Rhys Williams in Support of Verified Petition and Motion Under Chapter 15 for (I) Recognition of a Foreign Main Proceeding, (II) Recognition of JPL Appointment Order, (III) Recognition of Sanction Order, (IV) Approval of Free and Clear Transfer of Assets, (V) Approval of the Procedure Governing the Closing of this Chapter 15 Case, and (VI) Related Relief [To be filed in advance of hearing]<sup>3</sup>

Objection Deadline: November 25, 2024 at 12:00 p.m. (ET)

Objections/Informal Responses: None.

Status: This matter will be going forward.

*[Signature page follows]*

---

<sup>3</sup> The Foreign Representative will no longer be filing a declaration of Michael Myshrall in advance of the hearing.

Dated: November 26, 2024  
Wilmington, Delaware

Respectfully submitted,

/s/ Kara Hammond Coyle

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

Michael R. Nestor (No. 3526)

Kara Hammond Coyle (No. 4410)

Rebecca Lamb (No. 7223)

Rodney Square, 1000 North King Street

Wilmington, DE 19801

Telephone: (302) 571-6600

Email: mnestor@ycst.com

kcoyle@ycst.com

rlamb@ycst.com

– and –

George Davis (admitted *pro hac vice*)

David Hammerman (admitted *pro hac vice*)

Meghana Vunnamadala (admitted *pro hac vice*)

**LATHAM & WATKINS LLP**

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Email: george.davis@lw.com

david.hammerman@lw.com

meghana.vunnamadala@lw.com

– and –

Jason B. Gott (admitted *pro hac vice*)

Jonathan Gordon (admitted *pro hac vice*)

**LATHAM & WATKINS LLP**

330 North Wabash Avenue, Suite 2800

Chicago, IL 60611

Telephone: (312) 876-7700

Email: jason.gott@lw.com

jonathan.gordon@lw.com

*Counsel to the Foreign Representative*